

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MBIA INSURANCE CORPORATION, et al.	)	
	)	
Plaintiffs and	)	
Counterclaim Defendants,	)	
	)	
v.	)	C.A. No. 02-1294-JJF
	)	
ROYAL INDEMNITY COMPANY,	)	
	)	
Defendant and	)	
Counterclaim Plaintiff.	)	
_____	)	
	)	
ROYAL INDEMNITY COMPANY,	)	
	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
ANDREW N. YAO, et al.,	)	
	)	
Third-Party Defendants.	)	
_____	)	
	)	
ROYAL INDEMNITY COMPANY,	)	
	)	
Counter-Claimant,	)	
	)	
v.	)	
	)	
MBIA BANK, et al.,	)	
	)	
Counter-Defendants.	)	
_____	)	

CHARLES A. STANZIALE, JR.,	)	
CHAPTER 7 TRUSTEE OF	)	
STUDENT FINANCE CORPORATION,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 04-1551-JJF
v.	)	
	)	
PEPPER HAMILTON LLP, et al.,	)	
	)	
Defendants.	)	
<hr/>		
CHARLES A. STANZIALE, JR.,	)	
CHAPTER 7 TRUSTEE OF	)	
STUDENT FINANCE CORPORATION,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 05-72-JJF
v.	)	
	)	
McGLADREY & PULLEN LLP, et al.,	)	
	)	
Defendants.	)	
<hr/>		
ROYAL INDEMNITY COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-165-JJF
	)	
PEPPER HAMILTON LLP, et al.,	)	
	)	
Defendants.	)	
<hr/>		

**NOTICE OF DEPOSITION OF MARTIN J. LIEBERMAN**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure as well as Discovery Coordination Order #1 entered by the Court on June 19, 2006, defendants Robert L. Bast, Pamela Bashore Gagné, the Brennan Trusts, and W. Roderick Gagné, as Trustee of the Brennan Trusts, will take the deposition upon oral examination of Martin J. Lieberman, beginning on August 24, 2007 at 9:30 a.m. at the offices of McElroy, Deutsch, Mulvaney & Carpenter, LLP, Three

Gateway Center, 100 Mulberry Street, Newark, NJ 07102. Mr. Lieberman is directed to produce at the deposition all documents that he reviewed and upon which he relied in connection with his formation of the opinions he has expressed and intends to express in the above-captioned actions that were not disclosed in the report that Mr. Lieberman submitted in the above-captioned actions. The deposition shall be recorded stenographically. The deposition will continue from day to day until completed pursuant to the provisions of Discovery Coordination Order #1. All counsel of record are invited to attend and participate.

Respectfully submitted,

ECKERT SEAMANS CHERIN &  
MELLOTT, LLC

Dated: August 9, 2007

By: Karen Lee Turner/clp  
Karen Lee Turner, Esquire (DE No. 4332)  
300 Delaware Avenue, Suite 1210  
Wilmington, Delaware 19801  
(302) 425-0430  
(302) 425-0432 (Facsimile)

Neil G. Epstein, Esquire  
Carol L. Press, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
Two Liberty Place  
50 South 16<sup>th</sup> Street, 22<sup>nd</sup> Floor  
Philadelphia, PA 19102  
(215) 851-8400  
(215) 851-8383 (Facsimile)

Attorneys for Defendants Robert L. Bast, Pamela  
Bashore Gagné, the Brennan Trusts, and W. Roderick  
Gagné

M0603673.DOC